

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE,  
NASHVILLE DIVISION**

|                                      |   |                                       |
|--------------------------------------|---|---------------------------------------|
| <b>DARTANION A. MCGEE,</b>           | ) |                                       |
|                                      | ) |                                       |
| <b>Plaintiff,</b>                    | ) | <b>Civil Action No. 3:14-cv-01776</b> |
|                                      | ) |                                       |
| <b>vs.</b>                           | ) | <b>Chief Judge Haynes</b>             |
|                                      | ) | <b>JURY DEMAND</b>                    |
| <b>FOOD WARMING EQUIPMENT, INC.,</b> | ) |                                       |
| <b>BRIAN GATES, JOE PILKINGTON,</b>  | ) |                                       |
| <b>DEREK CODDINGTON, and</b>         | ) |                                       |
| <b>PHILLIP OHLSON.</b>               | ) |                                       |
|                                      | ) |                                       |
| <b>Defendants.</b>                   | ) |                                       |

**JOINT MOTION TO MODIFY SCHEDULING DEADLINES**

Plaintiff and Defendants, by and through undersigned counsel, hereby jointly move this Honorable Court to modify the discovery deadline and the dispositive motion filing deadline set forth in the Order Granting Joint Motion to Reschedule Trial Date and Modify Scheduling Deadlines (Doc. No. 29) filed on December 16, 2015. In seeking a modification of these deadlines, the parties represent that the requested modifications will not affect the currently scheduled trial date of August 30, 2016.

The parties specifically request that the discovery deadline be modified and extended through and including March 18, 2016, and that the dispositive motion filing deadline be extended through and including April 22, 2016, with any response due 30 days after any motion is filed and any reply due 10 days after any response is filed. The parties represent that they have been working diligently to complete discovery, have exchanged responses to written discovery including thousands of documents, have taken party depositions, and due to scheduling issues need additional time to depose other fact witnesses.

Accordingly, the parties respectfully request that the Court modify the discovery deadline and the dispositive motion filing deadline as requested.

Respectfully submitted,

**Law Office of Douglas B. Janney III**

By: /s/ Douglas B. Janney III  
Douglas B. Janney III (BPR No. 19112)  
2002 Richard Jones Road, Suite B-200  
Nashville, TN 37215  
(615) 742-5900  
[doug@janneylaw.com](mailto:doug@janneylaw.com)

Cynthia A. Sherwood  
Sherwood Boutique Litigation, PLC  
201 Fourth Avenue North, Suite 1130  
Nashville, TN 37219  
[cynthia@sherwoodlitigation.com](mailto:cynthia@sherwoodlitigation.com)

*Counsel for Plaintiff Dartanion A. McGee*

**Butler Snow, LLP**

By: /s/ H. Rowan Leathers III  
H. Rowan Leathers III (BPR No. 10023)  
April N. Knox (BPR No. 33392)  
The Pinnacle at Symphony Place  
150 Third Avenue South, Suite 1600  
Nashville, TN 37201  
(615) 651-6718  
[rowan.leathers@butlersnow.com](mailto:rowan.leathers@butlersnow.com)  
[april.knox@butlersnow.com](mailto:april.knox@butlersnow.com)

*Counsel for Defendants*

29788196v1